

EXHIBIT 316

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS,

No. 22-cv-10904-JSR

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

JPMORGAN CHASE BANK, N.A.,
Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,
Third-Party Defendant.

THE ORAL DEPOSITION OF INAIS BORQUE was taken
on the 26th day of May, 2023 at the Ritz-Carlton Hotel,
6900 Great Bay, Nazareth, St. Thomas, U.S. Virgin
Islands, between the hours of 9:07 a.m. and 3:33 p.m.
pursuant to Notice and Federal Rules of Civil Procedure.

Reported by:

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1 than a half an hour.

2 Q. (By Mr. Ackerman:) Okay. Thank you.

3 Did you review documents in preparation
4 for the deposition?

5 A. Yes.

6 Q. And did the documents you reviewed include
7 the sex offender file material that counsel showed you
8 during this deposition?

9 A. Yes.

10 Q. Okay. I want to ask you about the
11 compliance checks, which is the last topic you spoke
12 with me about.

13 You testified about weekly compliance
14 checks for sex offenders. Do you recall that?

15 A. Yes, I do.

16 Q. Please explain what you mean when you are
17 referring to weekly sex offense -- compliance check
18 for sex offenders?

19 A. What I meant by that is now that an
20 investigator is designated for the sex offender unit
21 is when we apply the every -- the weekly checkups,
22 random checkups. Doesn't have to necessarily be --
23 it's not monitoring. It's random.

24 Q. Is there any rule requiring a weekly
25 checkup of every sex offender in the Virgin Islands?

1 A. No.

2 Q. Okay. You said "now." For how long has
3 that practice been in effect?

4 A. I would say 2019.

5 Q. Okay. Do you know whether prior to 2019
6 there were weekly checkups of sex offenders in the
7 Virgin Islands?

8 A. I'm not sure because there wasn't an
9 investigator designated to the sex offender unit, but
10 they -- we did have the yearly checkups.

11 Q. Okay.

12 A. Which was the roundup.

13 Q. Explain to me -- explain to us what the
14 yearly checkup is.

15 A. The yearly checkup is just a random
16 checkup where we check all offenders in that one
17 week. We just randomly pop up at their residence to
18 make sure and confirm that they live at that
19 residence.

20 Q. Okay. When you say check all offenders in
21 one week, what do you mean by that?

22 A. Just randomly do compliance checks in that
23 one week, either in St. Croix or St. Thomas.

24 Q. Okay. And when you say either in St. Croix
25 or St. Thomas, Mr. Epstein didn't live on the island